

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION**

SABRINA FLOWERS,	)	
	)	Judge Marovich
Plaintiff,	)	
	)	07 C 0449
v.	)	
	)	
SOUTH WESTERN MOTOR SALES, INC.,	)	
D/b/a TOYOTA SCION on Western and	)	
SANTANDER CONSUMER USA, INC., d/b/a	)	
DRIVE FINANCIAL SERVICES,	)	
	)	
Defendants.	)	

**NOTICE OF MOTION**

**To: Dave Frankel [dfrankel@sormanfrankel.com](mailto:dfrankel@sormanfrankel.com)**  
**Brian P. Shaughnessy [bshaughnessy@cksslaw.com](mailto:bshaughnessy@cksslaw.com)**

**PLEASE TAKE NOTICE** that on April 8, 2008, at 10:30 a.m., I shall appear before the Honorable Judge George M. Marovich in Room 1944C of the United States District Court, Northern District of Illinois, Eastern Division, and shall there and then present a **PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**, a copy of which has been filed today with the ECF system for the Northern District of Illinois.

Respectfully submitted,

/s/Keith J. Keogh

Keith J. Keogh  
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**CERTIFICATE OF SERVICE**

I, Alexander H. Burke, hereby certify that on April 1, 2008, I served the foregoing to counsel of record listed above via the ECF system for the Northern District of Illinois:

/s/Keith J. Keogh